

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Joseph Zwicharowski  
Debtor

Nationstar Mortgage LLC,  
Movant,

v.

Joseph Zwicharowski,  
Respondent/Debtor,

William C. Miller, Trustee,  
Additional Respondent.

**CHAPTER 13**

**BANKRUPTCY CASE NUMBER  
17-11811/JKF**

**OBJECTION OF NATIONSTAR MORTGAGE LLC TO CONFIRMATION OF  
DEBTOR'S CHAPTER 13 PLAN OF REORGANIZATION**

Nationstar Mortgage LLC, by and through its counsel, Shapiro & DeNardo, LLC, hereby objects to the confirmation of Debtor's Chapter 13 Plan, and in support thereof, avers as follows:

1. On or about March 15, 2017, Debtor filed a voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code.

2. Movant holds an allowed claim, secured only by Debtor's principal residence located at 3982 Carteret Drive, Philadelphia, PA 19114.

3. Movant is in the process of filing its Proof of Claim citing arrears in the amount of \$2,071.29, and a total claim in the amount of \$144,220.26.

4. Debtor's proposed plan calls for the payment to Movant of arrearages in the amount of \$0.00 to be paid to the Trustee through the Plan.

5. The Plan is insufficiently funded to pay Movant its proposed arrearage claim or proposed total debt claim in full.

6. The Plan fails to comply with 11 U.S.C. § 1322.

7. The Plan fails to comply with 11 U.S.C. § 1325.

8. The Court must deny confirmation of Debtor's Chapter 13 Plan.

WHEREFORE, Nationstar Mortgage LLC respectfully requests that confirmation of the Debtor's Plan be denied, that Debtor's bankruptcy petition be dismissed with prejudice; and for such other relief as this Court deems appropriate.

Respectfully submitted,

Dated: March 22, 2017

S&D File #:17-056144

BY: /s/ Kevin S. Frankel  
Kevin S. Frankel, Esquire  
Shapiro & DeNardo, LLC  
3600 Horizon Drive, Suite 150  
King of Prussia, PA 19406  
(610)278-6800/ fax (847) 954-4809  
PA BAR ID #318323  
pabk@logs.com